

-----Original Message-----

From: Ateyeh, Laurel [mailto:lateyeh@pa.gov]

Sent: Friday, March 08, 2013 1:35 PM

To: Blanco-Gonzalez, Joel <Blanco-Gonzalez.Joel@epa.gov>

Cc: Patel, Pravin <prpatel@pa.gov>

Subject: RE: Review of draft Bucks County Water and Sewer Authority - Green Street STP, PA0021181

Joel,

All forms should have been transmitted electronically, but I am mailing the application. You should have it by Monday. Thanks.

Laurel Ateyeh | Environmental Engineering Specialist Department of Environmental Protection |
Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.5198 | Fax: 484.250.5971
www.depweb.state.pa.us

-----Original Message-----

From: Blanco-Gonzalez, Joel [mailto:Blanco-Gonzalez.Joel@epa.gov]

Sent: Friday, March 08, 2013 1:18 PM

To: Patel, Pravin

Cc: Ateyeh, Laurel; Trulear, Brian

Subject: RE: Review of draft Bucks County Water and Sewer Authority - Green Street STP, PA0021181

Pravin,

Thank you for replying to our request. We received a redraft permit for Bucks County Water and Sewer Authority on February 7, 2013 and currently reviewing the changes made by PADEP. Per our phone conversation today and based on our email correspondence, we will provide comments by March 14, 2013, at the latest.

If you have any questions concerning this matter, please let me know.

Thanks

Joel Blanco-Gonzalez
NPDES Permits Branch (3WP41)
Office of Permits and Enforcement
Water Protection Division | U.S. EPA Region 3
1650 Arch Street | Philadelphia, PA 19103 - 2029
Phone: (215) 814 - 2768 | Fax: (215) 814 - 2302
Email: blanco-gonzalez.joel@epa.gov

-----Original Message-----

From: Patel, Pravin [mailto:prpatel@pa.gov]

Sent: Friday, March 08, 2013 11:09 AM

To: Blanco-Gonzalez, Joel; Brian P. Trulear (bptepu3@hotmail.com)
Cc: Ateyeh, Laurel
Subject: RE: Review of draft Bucks County Water and Sewer Authority - Green Street STP, PA0021181

Joel:

I assume EPA have received reissued (dated 2/11/2013) copy of the draft permit. Please note concern raised by EPA (Mr. Weber's email dated 12/8/2012) on previously issued draft permit, are incorporated in the revised draft permit.

BSWSA conducted WET tests about 8 -9 years ago. Some of the information used in the tests may not be the same now such as effluent quality, flow etc. So we are asking permittee in this permit to conduct four quarterly WET tests beginning 30 days upon permit issuance. If all four test passes, then they go annually. If any of the quarterly test fails, permittee will required to retest within 30 days, until passes four tests and then they may go annually. If there is a failure of one or more endpoints in a re-test, permittee shall continue quarterly WET test in additional to initiate Phase I TRE and then Phase II TRE if necessary.

I think this approach will give as current condition of the effluent toxicity. This procedure is consistence with our SOP, where there is potential of toxicity in the effluent. The fact sheet will include clarification and will be consistence with the permit requirements.

We will send you additional requested documents (per attached email, if you still waiting for) for your review and file. With this changes to fact sheet and clarification, we will finalizing the permit upon completion of public comment period and will provide you with final documents. Please feel free to call me or Laurel if you have any questions.

Thanks,

Pravin

-----Original Message-----

From: Weber.Peter@epamail.epa.gov [mailto:Weber.Peter@epamail.epa.gov]

Sent: Wednesday, December 08, 2010 5:02 PM

To: Ateyeh, Laurel

Cc: Garg, Sohan; Trulear.Brian@epamail.epa.gov; MacKnight.Evelyn@epamail.epa.gov

Subject: Review of draft Bucks County Water and Sewer Authority - Green Street STP, PA0021181

Laurel,

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) Region III has reviewed the draft National Pollutant Discharge Elimination System (NPDES) permit for:

Bucks County Water & Sewer Authority - Green Street STP NPDES Number: PA0021181 EPA Received:
November 8, 2010

Based on our review of the Draft Permit and Water Quality Protection Report (WQPR), we are offering the following comments for your consideration and action:

1. According to the WQPR, the Whole Effluent Toxicity Testing (WETT) provided in the draft permit indicates that on July – August 2004 Ceriodaphnia Dubia, Survival NOEC and Reproduction NOEC failed. Also on September – October 2005 Ceriodaphnia Dubia, Reproduction NOEC failed. If the permittee fails any WETT, then increased testing should be implemented and in this particular case immediate back-to-back retesting should be performed, upon permit reissuance, to figure it out if any reasonable potential toxic such as lethal or sublethal is present in the facility performance. Accordingly, the draft permit should include WETT requirements upon permit reissuance.
2. PADEP must provide all of the elements regarding the draft permit package for our review. The elements are as follow:
 - a. Cover Letter
 - b. Public Notice
 - c. Draft Permit - already transmitted
 - d. WQPR and/or Fact Sheet - already transmitted
 - e. Limits Analysis
 - f. NPDES Application

Prior to finalizing this permit, please address the above and provide me with any changes to the draft permit. In addition, please forward to me any changes to the Fact Sheet / Pollution Report / WQPR, if necessary.

If you prefer, electronic versions of these documents can be sent instead of hard copies. Electronic versions of all final permit documents and Fact Sheets / Pollution Reports / WQPRs are preferred as well. Any questions, please contact me or:

Joel Blanco-Gonzalez
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Water Protection Division I U.S. EPA Region 3
1650 Arch Street I Philadelphia, PA 19103 - 2029
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Thanks,
Pete

Peter A. Weber NPDES Permits Program (3WP41) U.S. Environmental Protection Agency
1650 Arch Street Philadelphia, PA 19103-2029
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